

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEBRASKA

FILED
U.S. DISTRICT COURT
DISTRICT OF NEBRASKA

2022 FEB 22 PM 12:02

ALLAN SANDERS,

Plaintiff,

vs.

UNION PACIFIC RAILROAD CO.,

Defendant.

OFFICE OF THE CLERK

4:20CV3023

JUROR QUESTION A

4:20CV3023

Was the treadmill
on an incline?

Did that
affect why
he called that?

A

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JUROR QUESTION B

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Do you still do farm work, are
there restrictions there? Work
that is too much?

Who set the weight ^{& other} restriction?
Why were those #'s chosen?
_{& How}

~~Were~~ Were you offered a "desk
job"? Did you take or refuse?

B

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JUROR QUESTION C

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Did Mr Sanders ever
complete any
vocational rehabilitation?

Did Mr Sanders ever
complete a Bruce
protocol test?

Did Mr Sanders ever
complete a stress test on
a bike?

C

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JUROR QUESTION D

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FFW

Do you oversee personnel
that evaluate job duties
in the field?

If so how often are
job duties reevaluated?

~~FFW~~

D

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JUROR QUESTION E

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At what frequency will a
foreman general with do the
job task alone in the
field?

When an EE accepts a
foreman general position
does the EE sign off
on a job task?

As previous foreman general
is it not considered unsafe
to lift more than 50lbs
in the field alone?

E

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~~Could you explain when~~
~~replacing a knuckle~~ ^{are}
~~you kneeling kneeling~~

When replacing a knuckle
is the job performed
standing, kneeling or
squatting?

~~On Average~~

On Average how long
does it take to replace
a knuckle?

E

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JUROR QUESTION F

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#1 Was a Functional Capacity
test requested for Mr. Sanders
to find out what his max is
or what is too much for him,
~~that~~ since he is not an average
or non-experienced ~~railroad worker~~
off the street. _{person}

#2 ^{positions}
What ~~jobs~~ at UP would allow
Mr. Sanders to work with
a 10-20 lb. weight restriction?
for a dedicated emp who has given
years to the company.

F

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JUROR QUESTION G

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Is it reasonable to extrapolate lifting
~~restrictions based on a Bruce Protocol~~
~~Stress test?~~

Did you read & review the follow-up visit
medical records from Mr. Sanders
cardiologist?

G